



To whom it may concern,

Paris, Thursday, 07 February 2019

RE : 2019-02-07_Conformity of
Erasteel products to Conflict Minerals Act_CPE

Conformity of Erasteel products to Conflict Minerals Act

Madame, Monsieur

ERASTEEL is delivering High-speed steel products, made by conventional or powder metallurgy.

Having received the commitments from our cobalt and tungsten primary suppliers, we certify that the Tungsten (W) and the Cobalt (Co) used to manufacture our products do not come from the conflict area of the Democratic Republic of Congo or adjoining countries.

A handwritten signature in black ink, appearing to read "Christophe PETIT". The signature is written over a horizontal line that extends across the page.

Christophe PETIT
VP QUALITY

High Performance Alloys Division



To whom it may concern,

Paris, Thursday, January 24, 2019

RE : 2019-01-24_AD-ES_CM Policy Statement

Conflict Minerals Policy Statement

Aubert & Duval and Erasteel are delivering parts and metallurgical products in various metals or alloys, such as special steels, super alloys, titanium and aluminum.

Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act requires due diligence and disclosure requirements on companies that manufacture products containing certain minerals designated as "Conflict Minerals" – cassiterite, columbite-tantalite, gold, wolframite, and their derivatives tin, tantalum and tungsten – sourced from certain Central Africa countries – Democratic Republic of Congo or surrounding countries.

These requirements are based on concerns that revenues obtained from the commercialization of these minerals may finance the ongoing conflict in the Democratic Republic of Congo.

Although this is a US law, it impacts our companies that belong to the ERAMET Group, regardless of where our suppliers might be located.

In accordance with the ERAMET Group Code of Ethics, Aubert & Duval and Erasteel undertake to prohibit the use of « conflict minerals » for all our products, and to get organized with suppliers to meet this requirement.

To ensure compliance with these requirements, our company requires that each supplier in its supply chain provides information regarding the conflict minerals that may be contained in the products purchased by our companies and so continue to source responsibly.

Moreover, having received the commitments from our tungsten direct suppliers we certify that the Tungsten (W) used to manufacture our products do not come from the conflict area of the Democratic Republic of Congo and that we don't use Tin (Sn), Tantalum (Ta) and Gold (Au).



Christophe PETIT
VP QUALITY

High Performance Alloys Division

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www.eramet.com / www.erasteel.com



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Conflict Minerals Reporting Template (CMRT)

English

Revision 5.11
 April 27, 2018

[Link to Terms & Conditions](#)

The purpose of this document is to collect sourcing information on tin, tantalum, tungsten and gold used in products

Mandatory fields are noted with an asterisk (*). Consult the instructions tab for guidance on how to answer each question.

Company Information

Company Name (*):	ERASTEEL S.A.S.
Declaration Scope or Class (*):	A. Company
Description of Scope:	High-speed products, made by conventional or powder metallurgy
Company Unique ID:	VAT FR 03 352 849 137
Company Unique ID Authority:	French Government
Address:	10 Boulevard de Grenelle - CS 63205 - 75015 PARIS - FRANCE
Contact Name (*):	Mr. Christophe PETIT
Email - Contact (*):	christophe.petit@eramet-aubertduval.com
Phone - Contact (*):	+33 (0)1 45 38 63 00
Authorizer (*):	Mr. Christophe PETIT
Title - Authorizer:	VP QUALITY
Email - Authorizer (*):	christophe.petit@eramet-aubertduval.com
Phone - Authorizer (*):	+33 (0)1 45 38 63 00
Effective Date (*):	20-Jun-2018

Answer the following questions 1 - 7 based on the declaration scope indicated above

1) Is any 3TG intentionally added or used in the product(s) or in the production process? (*)	Answer	Comments
Tantalum	No	
Tin	No	
Gold	No	
Tungsten (*)	Yes	

2) Does any 3TG remain in the product(s)? (*)	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten (*)	Yes	Supplied essentially as FeW by European Traders (Mersher GmbH, Ferromet AB and AB Ferrolegeringar)

3) Do any of the smelters in your supply chain source the 3TG from the covered countries? (SEC term, see definitions tab) (*)	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten (*)	No	We buy only Ferrotungstene

4) Does 100 percent of the 3TG (necessary to the functionality or production of your products) originate from recycled or scrap sources? (*)	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten (*)	Yes	Our Suppliers recycle carbide muds and grinding scraps

5) What percentage of relevant suppliers have provided a response to your supply chain survey? (*)	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten (*)	100%	Written Commitments from our three suppliers

6) Have you identified all of the smelters supplying the 3TG to your supply chain? (*)	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten (*)	Yes	All suppliers have been identified and they guarantee the origin of their FeW supply



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English

Conflict Minerals Reporting Template (CMRT)

Revision 5.11
 April 27, 2018

[Link to Terms & Conditions](#)

The purpose of this document is to collect sourcing information on tin, tantalum, tungsten and gold used in products

Mandatory fields are noted with an asterisk (*). Consult the instructions tab for guidance on how to answer each question.

7) Has all applicable smelter information received by your company been reported in this declaration? (*)

	Answer	Comments
Tantalum	Yes	
Tin	Yes	
Gold	Yes	
Tungsten (*)	Yes	

Answer the Following Questions at a Company Level

Question	Answer	Comments
A. Have you established a conflict minerals sourcing policy? (*)	Yes	A Conflict Mineral Policy Statement signed by our CEO ERASTEEL on the 16-Jan-2017 and he forbides supply from CM area.
B. Is your conflict minerals sourcing policy publicly available on your website? (Note - If yes, the user shall specify the URL in the comment field.) (*)	Yes	www.erasteel.com
C. Do you require your direct suppliers to be DRC conflict-free? (*)	Yes	Included in standard contract language
D. Do you require your direct suppliers to source the 3TG from smelters whose due diligence practices have been validated by an independent third party audit program? (*)	No	
E. Have you implemented due diligence measures for conflict-free sourcing? (*)	Yes	Due diligence on our Supply Chain
F. Does your company conduct Conflict Minerals survey(s) of your relevant supplier(s)? (*)	Yes, in conformance with IPC1755 (e.g., CMRT)	
G. Do you review due diligence information received from your suppliers against your company's expectations? (*)	Yes	
H. Does your review process include corrective action management? (*)	No	
I. Is your company required to file an annual conflict minerals disclosure with the SEC? (*)	No	French Nationality

To ensure all required fields have been populated before submitting to your customers review form for any line items highlighted in red
[Click here to return to Declaration tab](#)

Required fields remaining to be completed: 0



Required Fields	Answer provided	Notes	Hyperlink to source
Company Name (*)	ERASTEEL S.A.S.	Complete	
Declaration Scope or Class (*)	A. Company	Complete	
Description of Supply	High-speed products, made by conventional or powder metallurgy	Complete	
Contact Name (*)	Mr. Christophe PETIT	Complete	
Email - Contact (*)	christophe.petit@eramet-aubertduval.com	Complete	
Phone - Contact (*)	+33 (0) 1 45 38 63 00	Complete	
Authorizer (*)	Mr. Christophe PETIT	Complete	
Email - Authorizer (*)	christophe.petit@eramet-aubertduval.com	Complete	
Phone - Authorizer (*)	+33 (0) 1 45 38 63 00	Complete	
Effective Date (*)	20-Jun-2018	Complete	
1) Is any 3TG intentionally added or used in the product(s) or in the production process? (*)			
Tantalum	No	Complete	
Tin	No	Complete	
Gold	No	Complete	
Tungsten (*)	Yes	Complete	
2) Does any 3TG remain in the product(s)? (*)			
Tantalum		Complete	
Tin		Complete	
Gold		Complete	
Tungsten (*)	Yes	Complete	
3) Do any of the smelters in your supply chain source the 3TG from the covered countries? (SEC term, see definitions tab) (*)			
Tantalum		Complete	
Tin		Complete	
Gold		Complete	
Tungsten (*)	No	Complete	
4) Does 100 percent of the 3TG (necessary to the functionality or production of your products) originate from recycled or scrap sources? (*)			
Tantalum		Complete	
Tin		Complete	
Gold		Complete	
Tungsten (*)	Yes	Complete	
5) What percentage of relevant suppliers have provided a response to your supply chain survey? (*)			
Tantalum		Complete	
Tin		Complete	
Gold		Complete	
Tungsten (*)		Complete	
6) Have you identified all of the smelters supplying the 3TG to your supply chain? (*)			
Tantalum		Complete	
Tin		Complete	
Gold		Complete	
Tungsten (*)	Yes	Complete	
7) Has all applicable smelter information received by your company been reported in this declaration? (*)			
Tantalum		Complete	
Tin		Complete	
Gold		Complete	
Tungsten (*)	Yes	Complete	
Question			
A. Have you established a conflict minerals sourcing policy? (*)	Yes	Complete	
B. Is your conflict minerals sourcing policy publicly available on your website? (Note - If yes, the user shall specify the URL in the comment field.) (*)	Yes	Complete	
The URL in the comment field	www.erasteel.com	Complete	
C. Do you require your direct suppliers to be DRC conflict-free? (*)	Yes	Complete	
D. Do you require your direct suppliers to source the 3TG from smelters whose due diligence practices have been validated by an independent third party audit organization? (*)	No	Complete	
E. Have you implemented due diligence measures for conflict-free sourcing? (*)	Yes	Complete	
F. Does your company conduct Conflict Minerals surveys of all relevant suppliers? (*)	Yes, in conformance with IPC1755 (e.g., CMRT)	Complete	
G. Do you review due diligence information received from your suppliers against your company's specifications? (*)	Yes	Complete	
H. Do your review process include corrective action management? (*)	No	Complete	
I. Is your company required to file an annual conflict minerals disclosure with the SEC? (*)	No	Complete	
Product List	In accordance with smelter selection criteria	Complete	
Smelter List - Tantalum		Not Required	
Smelter List - Tin		Not Required	
Smelter List - Gold		Not Required	
Smelter List - Tungsten		Complete	
All rows with "Smelter not listed" selected, have a name and country listed		Complete	